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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Technical Requirements to Enable Blocking of Video Programming based on Program Ratings	)	ET Docket No. 97-206
	)	
	)	
Implementation of Sections 551(c), (d), and (e) of the Telecommunications Act of 1996	)	

COMMENTS OF THE CONSUMER ELECTRONICS MANUFACTURERS ASSOCIATION

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November 24, 1997

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COMMENTS OF THE CONSUMER ELECTRONICS MANUFACTURERS ASSOCIATION

The Consumer Electronics Manufacturers Association ("CEMA"), a sector of the Electronic Industries Association ("EIA") hereby submits comments in response to the above-captioned Notice of Proposed Rulemaking ("the *Notice*").[1] In the *Notice*, the Commission has solicited comments on its proposal to implement the program-blocking requirements contained in Sections 551(c),(d) and (e) of the Telecommunications Act of 1996 ("the Act").[2]

As set forth more fully below, CEMA developed the program blocking technology commonly known as the "V-chip" and its members are

[1] Technical Requirements to Enable Blocking of Video Programming based on Program Ratings, Implementation of Sections 551(c), (d), and (e) of the Telecommunications Act of 1996, ET No, 97-206 (September 26, 1997).

committed to making blocking technology available to parents in the most expeditious, technically viable, and consumer friendly manner possible.

The following comments represent the consensus view of CEMA's member companies. Individual members, however, may have different views on a number of issues raised in the *Notice*, and CEMA anticipates these members may file their own comments.

I. Introduction and Statement of Interest

CEMA is the trade association representing the U.S. consumer electronics industry, the industry that provides the American public with televisions, personal computers, digital versatile disk (DVD) players, video cassette recorders, and a wide variety of other products. Our membership of over 400 companies includes most of the world's major consumer electronics manufacturers, and many smaller companies that design, produce, distribute, sell, and service electronic products.

Our industry is proud of its record of public service and innovation in adding socially beneficial functionality to consumer electronics devices. CEMA members developed closed captioning and descriptive video services, and have already incorporated parental choice features into many television receivers, set-top boxes, and direct satellite service converters. In this tradition, a CEMA engineering committee originated the V-chip concept, and CEMA has

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[2] Pub L. No. 104-104, 111 Stat. 56 (1996).

played the leading role in the development and evolution of program blocking technology.

CEMA is generally supportive of the Commission's proposals for the implementation of program blocking technology in television receivers. CEMA approves of the Commission's proposed designation of EIA-608, "Recommended Practice for Line 21 Data Service" as the methodology for the transmission of program ratings information, and CEMA encourages the inclusion of provisions of EIA-608 into the Commission's regulations as appropriate.[3]

At the same time, CEMA urges the Commission to set implementation timelines for blocking technology that take into account normal television design and production cycles, to refrain from imposing unnecessary or impractical regulations on television receivers, and to adopt market-driven rules that promote innovation and consumer choice in program blocking technology.

II. The Commission Must Revise its Proposed Implementation Timelines To Take Into Account the Design and Production Cycles of Analog and Digital Receivers.

The Notice sets forth proposed blocking technology implementation timelines for both analog and digital receivers. In the analog

[3] In addition, the CEMA R-4.3 Television Data Systems Subcommittee recently approved EIA-744 (October 1997), "Transport of Content Advisory Information using Extended Data Service ("XDS")." This standard specifically addresses the line 21 XDS packet for transporting the program ratings, and specifically supports the implementation of the revised industry proposal. Since EIA-744 will be incorporated into the next revision of EIA-608-B when issued, it would be appropriate for the Commission's regulations to refer to EIA-608-B as the industry standard for the transmission of program rating data within NTSC VBI line 21.

world, the Commission proposes that video blocking technology be implemented in at least one half of a manufacturer's applicable product line by July 1, 1998, and in the remainder of the product line by July 1, 1999.[4] With respect to digital sets, the Commission proposes that blocking technology be included within 180 days after the adoption of rules in this proceeding.[5] Both of these deadlines are unreasonably short, and highly unrealistic in view of the absence of an approved rating system or transmission standard.

It must be emphasized manufacturers cannot begin the blocking circuitry design process until the Commission issues its final rules in both this proceeding and the ratings proceeding currently underway in CS Docket 97-55.[6] Receiver manufacturers need the certainty of knowing exactly what ratings system they are to respond to and what transmission standard will be used prior to commencing design and development. [7] The Commission's swift action in these two proceedings will help ensure that parents receive access to blocking technology as rapidly as possible.

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[4] *Notice* at ¶ 15.

[5] *Id.* at ¶ 19.

[6] *See Public Notice*, "Commission Seeks Comment on Revised Industry Proposal for Rating Video Programming," CS Docket No. 97-55, FCC 97-321, issued September 9, 1997.

[7] Competitive pressures may induce some manufacturers to attempt to speed sets to market by beginning the design process prior to the Commission's actual approval of a rating system. Such manufacturers would presumably design their blocking features to operate with the revised industry proposal submitted by NAB, NCTA, and MPAA on August 1, 1997. To the extent that a manufacturer elects to proceed prior to official Commission action, it is possible that it could introduce V-chip equipped sets prior to July of 1999, so long as the Commission adopts the revised industry proposal, without revision, as the single required ratings system.

The timelines ultimately adopted by the Commission must also take into account the fixed parameters of manufacturer design and production cycles. For most manufacturers, the design cycle for a television receiver model takes approximately 18-24 months. The cycle generally begins in January, and leads to product introduction the summer of the following year in time for the holiday buying season. [8]

Under the production cycle faced by most manufacturers, the market introduction of blocking technology equipped sets on the market by the Commission's proposed date of July 1998 would have required manufacturers to begin the product development process (and the Commission to have adopted a ratings system) by January 1997. Indeed, the Commission's proposed timeline (assuming the January 1998 publication of a Final Report and Order adopting a ratings system) would require manufacturers to perform the extraordinary task of reducing the design cycle from 18 to six months, compressing the normal development timeline by two thirds.[9]

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[8] In ¶ 15 of the Notice, the Commission states that it would not be reasonable to require receivers to include program blocking capability beginning in February of 1998, or two years after the Act's passage, the earliest date under which such a requirement could be mandated under the Act. It must be emphasized that Congress intended the two year implementation period to be a "floor", or minimum implementation time, as opposed to a "ceiling" or mandatory date certain. We add that while the Commission should be commended for assembling consensus around such a contentious issue, it is highly unlikely that Congress foresaw that it would require nearly the entire two year period merely for Commission approval of a rating system. Indeed, it is safe to presume the Congress intended that most of the two years would be devoted to manufacturer implementation in recognition of the 18 month television receiver development cycle.

[9] The NPRM at ¶ 15 states that the Commission derived its proposed timeline after "informal consultation with TV manufacturers." While CEMA is not aware of the source of this information, we have been consistent in our communications with the Commission regarding the necessity for at least an 18 month period between the final approval of a ratings system and transmission standard and the commercial introduction of decoder-equipped receivers. Minutes of the January 7, 1997 meeting of the Television Data Systems Subcommittee (R4.3) contain the record of a

Once final FCC technical requirements and a rating system are adopted, manufacturers can begin the 18-24 month process of designing receivers that include program blocking circuitry. A partial list of the steps in this development process includes:

- Integrated circuit design and development;
- User interface design and development;
- Hardware and software system design and development;
- Laboratory builds (construction of at least two generations of laboratory prototypes);
- Laboratory testing;
- Factory builds (construction and retooling of two generations of fully designed receivers);
- Field testing of the end-to-end program blocking system;
- Release of final software;
- Quality assurance testing;
- Final Production

Each of these individual steps is critical to ensuring that a blocking technology equipped receiver is quality tested and fully functional before it

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conference call between the Subcommittee and the Chief of the Commission's Standards Development Branch [the "Chief"]. This portion reads as follows:

> [The Chief] expressed understanding of our industry's product introduction cycle, and the need to accommodate it as much as possible. *The Subcommittee informed [the Chief] that the FCC must give us the requirements for a ratings system by Fall (Sept.) '97 in order to incorporate them into the standard by January 1, 1998. This would permit first production models in mid-1999 (18 months after the standard is finalized).*" (emphasis added).

reaches the consumer. The Commission should note that each product will require several rounds of laboratory prototype construction and testing, and at least two laboratory builds prior to the beginning of construction. In addition, many of these steps are dependent on externalities beyond a manufacturer's control. For example, field testing of the program blocking system cannot occur until broadcasters begin transmitting encoded ratings data with their programming.

For both public interest and economic reasons, manufacturers will work aggressively to bring V-chip equipped sets to consumers as rapidly as possible. However, forcing manufacturers radically to compress or abrogate the manufacturing and testing process may cause the introduction to the marketplace of program blocking technology that is less than fully functional.

The ultimate consumer acceptance of the V-chip will depend on the ability of the first generation of blocking technology to meet the public's high expectations. A slight delay in the Commission's ambitious V-chip introduction timetable will be significantly less injurious to the Commission's goals in this proceeding than would be the consumer purchase of a set whose blocking capability does not work as expected or is exceedingly difficult to understand and operate.

With respect to digital sets, there is no reason to expect that the established 18-24 month production cycle for analog television models will not also apply to the manufacturer of digital receivers. In fact, given the challenges inherent in introducing an entirely new technology, it is reasonable to anticipate

an extended product development cycle, especially in consideration of the rigorous quality assurance testing that will be necessary prior to the marketplace introduction of DTV.

The development cycle for the digital receivers to be introduced in 1998 is already well underway, and by the time that DTV program rating standards and transmission methods are finalized, it will be too late to implement blocking technology in these initial receivers. Should the Commission subject DTV receivers to an unrealistic implementation deadline, manufacturers may be forced to delay the introduction of digital sets to the market, thus frustrating both CEMA's and the Commission's interest in an expeditious DTV transition.

With respect to both digital and analog implementation, CEMA suggests that a reasonable timeline would require the incorporation of blocking technology into at least half of a manufacturer's product models not less than 18 months following final approval by the Commission of the applicable transmission standards and rating systems (presuming finalization of the ratings systems and transmission standards in the January time frame) and implementation in remaining models twelve months thereafter. Such a timeline will provide manufacturers a sufficient period to provide the public with effective blocking technology.

III. The Commission's Rules Should Promote the Rapid and Widespread Parental Use of Affordable Program Blocking Technology

In the Notice, the Commission indicates its preference for rules that would require receivers to decode multiple rating systems transmitted.[10] The Commission also proposes that receivers be required to accommodate rating systems other than those transmitted over analog Line 21.[11] CEMA strongly objects to both proposals, and believes them to be counterproductive to the goal of promoting parental use and acceptance of program blocking technology.

A. The Commission Should Not Require Receivers to Decode More Than One Rating System.

The Commission should not impose on manufacturers and consumers a requirement that receivers receive and decode multiple rating systems. The Commission should recognize that requiring a television set to handle a multiplicity of rating systems will inevitably result in increased design and engineering resources expended by the manufacturer, increased cost to the consumer, and increased confusion for the parent.

Simplicity will be the key to the V-chip's success. The more rating alternatives mandated by the Commission, the greater the complication faced by the parent attempting to utilize the equipment. CEMA suggests that it is asking a great deal of viewers to expend the time needed to understand and program

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[10] *Notice* at 10.

[11] *Id.*

even a single rating system. If a multiple ratings system requirement were to result in consumer frustration or confusion, the principal goal of this proceeding—namely, empowering parents to determine what video content comes into the home—will not be fulfilled. Indeed, the widespread adoption and use by parents of a single, easy-to-use rating system would more effectively advance the Commission's objectives than provision of numerous ratings system choices that are not utilized by consumers.

In addition, the legislative history of Section 551 is devoid of any indication that Congress was directing the Commission adopt a multiplicity of rating systems. Instead, references to the Commission's obligation under Section 551 are uniformly in the singular, rather than the plural: i.e. "The Commission is authorized to prescribe guidelines . . . for *a rating system* . . ." (emphasis added).[12] A requirement that EIA-608 accommodate multiple rating systems oversteps the intent of Congress as expressed in the Act.

With respect to DTV, we urge the adoption of the same ratings system approved by the Commission for use with analog television. The Commission's adoption of the analog rating system for DTV use would allow manufacturers to maintain a consistent user interface in both analog and digital models, encouraging parent familiarity with and use of the program blocking capability.

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[12] Conference Report 104-230, 104th Cong., 2d Sess. at 195.

We point out that the general nature of program content is not expected to vary between DTV and NTSC systems. Indeed, during the early stages of the DTV transition, broadcasters are expected to simulcast the vast majority of their programming on both their DTV and NTSC channels. There is no reason to expect that a single rating system cannot be applied in a uniform fashion to both digital and analog transmissions. In addition, most DTV receivers will be "dual mode," or capable of receiving both analog and digital programming. A requirement applying different ratings systems to analog and digital programming received over the same set is bound to cause considerable parental confusion.

While digital television will offer parents more capability and flexibility with regard to program blocking, we urge the Commission to refrain from imposing a multitude of regulations upon a technically sophisticated device simply because the technology makes such regulations possible. At the very least, the Commission should forbear from imposing additional obligations on digital television until experience makes clear that such requirements are necessary and appropriate.

As consumer familiarity with blocking technology increases and market demand develops, manufacturers of analog receivers, seeking to differentiate their products in a competitive market, may choose on their own to offer products that decode multiple rating system. With the arrival of DTV, manufacturers surely will rush to present all of the benefits digital technology offers to viewers, including enhanced capabilities with respect to parental choice.

However, both sound public policy and Congressional intent dictate that these decisions be driven by the marketplace rather than by regulation.

With respect to the digital transmission standard, CEMA suggests that the Commission defer consideration of technical rules for DTV program blocking until an industry developed standard has been endorsed. The Commission is aware that the ATSC is in the process of balloting Document T3/S8-193 "Program and System Information Protocol for Terrestrial Broadcast and Cable."[13] ATSC T3/S8-193 provides only the means for transmission of program ratings and does not include specific ratings system information. However, as stated above, we see no reason why the program rating system chosen for DTV need be any different than that chosen for NTSC.

B. Analog Receivers Should Not Be Required to Decode Rating Systems That May Be Developed in the Future, Nor Should a Current Rating System Be Revised or Altered Once Approved By the Commission.

The *Notice* requests comment on whether receivers should be required to accommodate Line 21 ratings systems that may be developed in the future.[14] CEMA strongly opposes any such requirement. The blocking decoder circuitry, once installed in a receiver, cannot be modified to accommodate

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[13] EIA is currently developing a DTV closed captioning standard, EIA-708. Contrary to the Commission's statement in paragraph 18 of the NPRM, EIA-708 deals exclusively with closed captioning and does not currently include any functionality similar to the Extended Data Services found in EIA-608. EIA-708, therefore, does not include any program blocking capabilities or guidance on the implementation of program blocking. There are no current plans to extend EIA-708 since the other functions included in EIA-608, are, in the digital world, incorporated into the data channel of the ATSC system.

[14] *Notice*, at ¶ 12.

additional rating systems. Instead, each adoption of an additional ratings system would require manufacturers to redesign the circuitry that allows receivers to decode the ratings information accurately. In effect, receiver manufacturers would be perpetually condemned to a costly and time consuming upgrade cycle as various ratings systems are introduced, modified and discarded.

In addition, it is critical that the final ratings system, once approved by the Commission, not be altered or changed. In the near future, the vast majority of the 27 million television receivers sold each year will be equipped with blocking technology. These receivers will be able to decode only those ratings systems that have been specified within their blocking circuitry. Future revisions to an existing ratings system would therefore cause massive V-chip obsolescence in those receivers already sold and in place in American homes.

It is important that the Commission remember that television receivers are durable household products: most consumers will keep a set for ten or more years. Consumers deserve the certainty of knowing that the features they purchase will continue to work as long as they own their receiver. We urge the Commission not to penalize viewers by shortening the useful life expectancy of their television receivers.

C. The Commission Must not Mandate the Inclusion of Multiple Blocking Technologies in Television Receivers.

CEMA strongly opposes the Commission's proposal that receivers be required to include Line 21 program blocking capability as well as alternatives

such as time/date/channel blocking.[15] Such additional regulatory requirements are not called for in the Act, would significantly increase the cost of complying with the Commission's rules, and force all consumers to purchase necessarily complex systems they may not want. Finally, such a requirement would deprive manufacturers of the opportunity to develop and implement alternative blocking technologies in response to market demand.

The Telecommunications Act requires that television receivers receive only those rating signals "which have been transmitted by way of line 21 of the Vertical Blanking Interval [VBI] and which conform to the signal and blocking specifications established by industry under the supervision of the Commission."[16] The Act also requires the Commission to evaluate alternative blocking technologies based upon cost, effectiveness, and ease of use.[17] However, the language of the Act clearly intended to give the Commission a choice of requiring receivers to incorporate Line 21 blocking or an alternative blocking technology. Specifically, Section 330(c)(4) provides that:

> If the Commission determines that an alternative blocking technology exists . . . the Commission shall amend the rules prescribed pursuant to Sec. 303(x) to require the apparatus described in such section be equipped with either the blocking technology described in such section or the alternative blocking technology described in this paragraph. (emphasis added).

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[15] *Notice* at ¶ 13.

[16] 47 U.S.C. § 330(c)(3) (1996).

[17] 47 U.S.C. § 330(c)(4) (1996).

A rule mandating that receivers include both Line 21 blocking and alternative blocking technology would be directly contrary to this statutory language. Such a requirement would also be unnecessary from both a technical and a public policy standpoint.

As mentioned in the *Notice*, one alternative for non-Line 21 rating systems is technology that blocks a specific program that occurs on a time, date, or channel basis.[18] Over 18 million homes already contain a television, VCR, or DSS box with this capability. So long as there is consumer demand, manufacturers will continue to incorporate time/date/channel blocking and other innovative blocking features to improve their products in a competitive marketplace. To the extent that viewers wish to block programming on a specific time, on a specific date, or on a specific channel, they can simply purchase a suitably equipped receiver and do so.

IV. The Commission Should Rely on the Competitive Marketplace to Develop the Most Effective User Interface Designs

CEMA strongly urges the Commission not to mandate a specific user interface for use with the program blocking application. Competition-driven interface development, if allowed to occur, will encourage innovation, variety, and, ultimately, the most user-friendly possible systems. By contrast, a mandated interface would discourage manufacturer competition and innovation,

[18] Since EIA-608 essentially provides for an automatic channel block, requiring receivers to include time/date/channel blocking as well as Line 21 blocking would be largely redundant.

delay the development of new interface technology, and restrict the choices available to consumers on the marketplace.

The development of the closed captioning interface provides an instructive example of marketplace-driven interface development. Although television receivers are required to decode and display closed captions, the Commission wisely chose not to mandate a specific receiver interface for closed caption display. The closed caption interfaces currently on the market are universally easy to operate and user friendly.

More importantly, manufacturer competition has led to the invention of numerous innovative closed-caption interface features, such as the automatic display of closed captions when the TV audio is muted. The need for competitive product differentiation can be expected to lead to similar innovation with respect to the program-blocking interface.

In addition, each manufacturer will require the flexibility to design a user interface that is most appropriate for its particular receivers. Since not all receiver user interfaces are alike, the blocking interface that is the most "user friendly" may vary greatly between brands and models. Small screen sets, for example, may have only a limited on-screen user interface capability, while larger sets may make more elaborate use of the screen.

The Commission should also note that user interface recommendations have already been addressed by the CEMA R4.3 Committee in Engineering Bulletin EIA/CEB1, "Recommend Practices for Content Advisory

Extended Data Service (XDS) Packet." The R4.3 Committee continues to further develop EIA/CEB1 in an open standards forum.

In the final analysis, the most effective way for the Commission to assist manufacturers in the development of a simple user interface would be the designation of a single program rating system. A requirement that receivers be able to accept multiple ratings systems will require a more complex interface, increasing the demands on both the manufacturer and the viewer.

V. The Commission Should Unambiguously State That the Program Blocking Requirements Do Not Apply to Receive-Only Devices, Televisions Used Outside the Home, and Content Displayed Over the Internet

The Commission proposes that, in view of the language contained in Section 551(c) of the Act, the program blocking requirements should apply to any apparatus with a screen size of 13" or larger that is designed to receive or display television signals.[19] Under this framework the Commission soundly proposes, and CEMA agrees, that program blocking rules should only apply to computers in the same manner as with closed captioning requirements.[20]

CEMA therefore is puzzled by and vehemently opposes the Commission's proposal that DTV receiver boards be required to include blocking technology. Receiver boards are incapable of displaying television signals and thus clearly fall outside the purview of Section 551(c). Indeed, the Commission's rationale in exempting stand-alone analog receiver boards from closed

[19] *Notice*, at ¶ 22.

[20] DA 95-581 (March 22, 1995).

captioning requirements would appear to be equally applicable with respect to program rating requirements. CEMA therefore urges the Commission to consider DTV receiver boards exempt from program blocking requirements unless sold with a computer monitor. In addition, CEMA would strongly oppose any effort to extend the program blocking requirements to other receive-only devices such as VCR's, cable set-top boxes, and DSS and MMDS converter apparatus.[21]

CEMA also requests the Commission to grant television receivers intended for use outside the home an exemption from program blocking requirements. As envisioned by Congress, the Commission, and the American public, the V-chip is a device to be used by parents in a household context. Each year, a significant number of receivers are sold for outside the home or "industrial" use. Positioned in settings such as hospitals, airports, bars, hotels and restaurants, these receivers are used to provide entertainment or information to multiple, transient viewers. In such environments, there is no parental control application. Instead, program-blocking capability would at best be unnecessary, or, at worst, an unintentional technological nuisance. Exempting such receivers from the program blocking requirements would in no way injure the Commission's goal of empowering parents to determine what video content comes into the home.

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[21] The Commission inquires about the possible use of VCR's and other devices by children to defeat blocking technology. CEMA does not at this time view this as a problem, because current VCRs, cable boxes, and DBS converter boxes pass line 21 data intact. To the extent that a

We also request the Commission to unambiguously state that program blocking rules will not apply to content downloaded or displayed by televisions or computers over the Internet. The Act's express application to traditional television transmissions clearly does not apply to graphics, compressed video, or other Internet content. Therefore, the Commission should make clear that Internet content does not come within the jurisdiction of Section 330 of the Act.

VI. The Commission Should Amend its Rules to Ensure that Video Programming Providers Cannot Delete or Modify Program Ratings Information Carried on Line 21 of the VBI.

As the Commission correctly notes, the proper functioning of blocking technology contained in a receiver is fundamentally dependent on the complete and unaltered passage of the ratings information through the entire video distribution system. CEMA therefore supports the Commission's proposal to require all video programming providers, including cable systems, to pass program ratings information intact without deletion or modification.

VII. CONCLUSION

As set forth above, CEMA supports the Commission's video program blocking rules consistent with CEMA's comments as set forth herein. Specifically, CEMA urges the Commission to (i) revise its proposed implementation timelines to take into account the design and production cycles

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problem is brought to CEMA's or the Commission's notice in the future, CEMA will gladly work with the Commission to develop an appropriate solution on a case-by-case basis.

of analog and digital receivers; (ii) adopt a single ratings system for both the analog and video environments, and to refrain from requiring receivers to include alternative blocking technologies or decode multiple or future systems; (iii) unambiguously state that the program blocking requirements do not apply to

receive-only devices, televisions used outside the home, and content displayed over the Internet; and (iv) require all video programming providers to pass rating information through without deletion or modification.

Respectfully submitted,

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November 24, 1997